

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK**

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In re:

ANTHONY T. ROSS, Jr.,

**Case No. 8-16-74455-AST
Chapter 7**

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NOTICE OF MOTION

PLEASE TAKE NOTICE, that upon the application (the “Application”) of Robert L. Pryor, Chapter 7 Trustee (the “Trustee”) of the Bankruptcy Estate of Anthony T. Ross, Jr. (the “Debtor”), by his attorneys, Pryor & Mandelup, L.L.P., a hearing will be held on January 15th, 2019 at 10:30 A.M. (the “Hearing Date”), or as soon thereafter as counsel can be heard, before the Honorable Alan S. Trust, United States Bankruptcy Judge, at the United States Bankruptcy Court, Alfonse M. D’Amato Federal Courthouse, 290 Federal Plaza, Room 960, Central Islip, New York 11722 for the entry of an Order: (1) holding the Debtor, Anthony T. Ross, Jr., in contempt of court for refusing to comply with an Order of the Bankruptcy Court entered on September 12, 2018 pursuant to Bankruptcy Rule 9020; (2) requesting sanctions against the Debtor, Anthony T. Ross, Jr., in light of his contempt of court, in the amount of two hundred fifty dollars (\$250.00) per day for each day that he refuses to comply with the terms of the Order of the Bankruptcy Court entered on September 12, 2018; (3) awarding to Pryor & Mandelup, LLP, as attorneys for the Trustee, legal fees in the sum of \$1,500.00 for the drafting of the within Motion for Contempt and (4) granting such other and further relief as to this Court is just and proper.

PLEASE TAKE FURTHER NOTICE, that pursuant to E.D.N.Y. LBR 9006-1(a), any objection or response (the “Objections”) to the Application must be made in writing, must state

the standing of the objectant, state with particularity the grounds for the objection, shall conform to the Federal Rules of Bankruptcy Procedure and Local Rules of the Bankruptcy Court, and shall be filed with the Bankruptcy Court electronically in accordance with General Order 559. (General Order 559 and the User's Manual for the Electronic Case Filing System can be found at www.nyeb.uscourts.gov, the official Web-site of the Bankruptcy Court), by registered users of the Bankruptcy Court's case filing system and, by all other parties in interest, on a 3.5 inch diskette, CD or DVD preferably in Portable Document Format (PDF), Microsoft Word or any other Windows-based word-processing format (with a hard-copy delivered directly to the Chambers of Hon. Alan S. Trust, at the above address), and must be served in accordance with General Order 559 upon: (I) Pryor & Mandelup, L.L.P., Counsel to the Trustee, 675 Old Country Road, Westbury, NY 11590, Attn: Michael Farina, Esq., and (ii) the Office of the United States Trustee, 560 Federal Plaza, Central Islip, NY 11722, so as to be filed and actually received no later than January 8th, 2019 at 5:00 p.m. on that day (the "Objection Date").

PLEASE TAKE FURTHER NOTICE, that if no objections are received by the Objection Date, the relief requested in the Application may be granted without a hearing.

Dated: Westbury, New York
November 30, 2018

PRYOR & MANDELUP, L.L.P.
Attorneys for Robert L. Pryor, Trustee

By: /s/Michael Farina
Michael Farina
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TO: OFFICE OF THE UNITED STATES TRUSTEE
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